

Mr. Dave Soper
Firestone Industrial Products Company
1700 Firestone Boulevard
Noblesville, Indiana 46060-3023

Re: 057-15021
First Administrative Amendment to
Part 70 T057-5997-00006

Dear Mr. Soper:

Firestone Industrial Products Company was issued a permit on March 29, 2001 for a rubber products manufacturing source. A letter requesting a change in the permit was received on December 6, 2001. The change involves the replacement of two (2) current external baghouse associated with the wheelabrator operations (insignificant activity) with one (1) internal baghouse. The new baghouse is designed with a grain loading of 0.01 grains per dry standard cubic foot at 4500 cubic feet of air per minute. Based on the baghouses designs, the new baghouse will allow less PM emissions than the existing one. Therefore, the change is exempted from New Source Review and qualifies as a "revisions to descriptive information where the revision will not trigger a new applicable requirement or violate a permit term" under 326 IAC 2-7-11, Administrative Amendment. Amendment is as follows (changes are bolded and deletions are struck-through for emphasis):

(1) Section A.3 item (f) of the Part 70 is revised as follows:

- (f) ~~Six (6)~~ **Four (4)** grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

Two (2) wheelabrator operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.01 grains per actual cubic foot and a gas flow rate less than or equal to 4500 cubic feet per minute, including the following: deburring, buffing, polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(2) The change is also reflected in Section D.8 as follows:

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

(a) through (e) - No changes

(f) ~~Six (6)~~ **Four (4)** grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

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(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

The following Condition D.8.1 is also revised to reflect the changes:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the particulate matter (PM) from the insignificant activities, such as the slush oven, identified as 124, two (2) calendering processes, identified as 106 and 107, one (1) extrusion process, one (1) rubber mill mixer, ~~and six (6)~~ **four (4)** grinding, ~~and machining and two (2) wheelabrators operations~~ shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour, and} \\ P = \text{process weight rate in tons per hour}$$

All other conditions of the permit shall remain the same. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.
If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0
and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

APD

cc: File - Hamilton County
U.S. EPA, Region V
Hamilton County Health Department
Air Compliance Section Inspector - Marc Goldman
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Firestone Industrial Products Company
1700 Firestone Boulevard
Noblesville, Indiana 46060**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

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| Operation Permit No.: T 057-5997-00006 | |
| Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality | Issuance Date: March 29, 2001 |
| Second Administrative Amendment No.: 057-15251 | Affected Pages: 7, 8, 46 |
| Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Chief Permit Branch Office of Air Quality | Issuance Date:January 14, 2002 |

- (g) One (1) large cement application booth, identified as emission unit 017, exhausted to T-30, constructed in 1980, for applying adhesive to metal parts, equipped with brushes for hand application, capacity: 88 metal parts per hour.
- (h) One (1) product manufacturing operation which consists of sixty-two (62) curing presses, identified as emission units 029 through 080, and 130 through 139, estimated capacity: 1,600 pounds of compounded rubber per hour, total; sixteen (16) vulcanizers, identified as emission units 082 through 096 and emission unit 148, estimated capacity: 900 pounds of compounded rubber per hour, total; building, crimping and assembling operations, estimated capacity: 1,000 pounds of metals and molded rubber parts per hour, 400 pound of calendered gum stock per hour, and 440 pounds of calendered fabric per hour.
- (i) One (1) natural gas boiler, identified as emission unit 001A, exhausted to stack BS-1A, constructed in 1998, using No. 2 fuel oil as backup fuel, rated at 31.38 million British thermal units per hour.
- (j) One (1) rubber compounding operation, identified as emission unit 003, consisting of weighing and conveying raw materials, equipped with a baghouse and exhausted to M-15, constructed in the 1980s, estimated capacity: 1,530 pounds of rubber per hour, 770 pounds of carbon black per hour, and 200 pounds of pigments per hour.
- (k) Two (2) air stripping towers, identified as emission units 008 and 009, exhausted to AS-1 and AS-2, constructed in 1992, capacity: 800 gallons per minute, each.
- (l) One (1) swabbing operation, identified as emission unit 081, exhausted to P-1, constructed prior to 1980, capacity: 11,680 gallons of solvent and cement per year.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Six (6) parts washer units, identified as emission units 023 through 028. [326 IAC 8-3-5]
- (b) The following emission unit emitting greater than one (1) pound per day, but less than five (5) pounds per day or one (1) ton per year of a single HAP:

One (1) cure oven, identified as emission unit 124, using dibutyl phthalate. [326 IAC 6-3-2]
- (c) Two (2) calendering processes equipped with two (2) calendering lines identified as emission units 106 and 107, constructed in 1971 and 1957, respectively, capacity: 2,700 pounds of compounded rubber per hour, total. Also including four (4) calender warmup mills identified as emission units 097 through 100, capacity: 5,400 pounds of compounded rubber per hour, total. [326 IAC 6-3-2]
- (d) One (1) extrusion process equipped with five (5) extruder warmup mills, capacity: 1,800 pounds of compounded rubber per hour, total; and three (3) feed extruders, capacity: 900 pounds of compounded rubber per hour. [326 IAC 6-3-2]
- (e) One (1) rubber mill mixer, identified as emission unit 007, equipped with a baghouse J10, capacity: 118 pounds of compounded rubber per hour. [326 IAC 6-3-2]
- (f) Four (4) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than

or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

Two (2) wheelabrator operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.01 grains per actual cubic foot and a gas flow rate less than or equal to 4500 cubic feet per minute, including the following: deburring, buffing, polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

- (g) Degreasing operations that do not exceed 145 gallons per twelve (12) months, except if subject to 326 IAC 20-6.
- (h) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to one percent (1%) by volume.
- (i) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (j) Paved and unpaved roads and parking lots with public access.
- (k) On-site fire and emergency response training approved by the department.
- (l) Other emergency equipment as follows: stationary fire pumps.
- (m) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kiloPascals measured at 38EC).
- (n) A laboratory as defined in 326 IAC 2-7-1(21)(D).
- (o) One (1) devulcanizer, identified as emission unit 118.
- (p) One (1) cement mix house, identified as emission unit 122.
- (q) One (1) No. 2 fuel oil storage tank, identified as emission unit 112.
- (r) Two (2) process oil storage tanks, identified as emission units 113 and 114.
- (s) Research and Development activities as defined in 326 IAC 2-7-1(21)(E).
- (t) Seven (7) repair curing presses, identified as emission units 141 through 147, capacity: 80 pounds of compounded rubber per hour.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22); and
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.8

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant Activities

- (a) Six (6) parts washer units, identified as emission units 023 through 028. [326 IAC 8-3-5]
- (b) The following emission unit emitting greater than one (1) pound per day, but less than five (5) pounds per day or one (1) ton per year of a single HAP:

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- (f) Four (4) grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 6-3-2]

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D.8.2 Volatile Organic Compounds (VOC)

- (a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of the six (6) parts washer units shall ensure that the following control equipment requirements are met:

- (1) Equip the degreaser with a cover. The cover must be designed so that it can be

easily operated with one (1) hand if: